

# **EXHIBIT B**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MDL No. 16-2738 (FLW) (LHG)

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY LITIGATION

The remote video deposition of WILLIAM LONGO, Ph.D., taken via Zoom videoconference on May 2, 2024, commencing at approximately 11:20 a.m., before Lois Anne Robinson, Certified Realtime Reporter.

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1	A P P E A R A N C E S		
2	COUNSEL FOR PLAINTIFFS:		
3	BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.		
	218 Commerce Street		
4	Montgomery, Alabama 36103		
	BY: Leigh O'Dell, Esquire		
5	Leigh.odell@beasleyallen.com		
	Leanna Pittard, Esquire		
6	Leanna.pittard@beasleyallen.com		
7	ASHCRAFT & GEREL		
	1825 K Street NW, Suite 700		
8	Washington, DC 20006		
	BY: Michelle A. Parfitt, Esquire		
9	Mparfitt@ashcraftlaw.com		
10	COHEN, PLACITLA & ROTH		
	127 Maple Avenue		
11	Red Bank, New Jersey 07701		
	BY: Christopher Placitella, Esquire		
12	Cplacitella@cprlaw.com		
	Drew Renzi, Esquire		
13	Drenzi@cprlaw.com		
14	REILLY, McDEVITT & HENRICH, P.C.		
	3 Executive Campus, Suite 310		
15	Cherry Hill, New Jersey 08002		
	BY: Stephanie DiVita, Esq.		
16	Sdivita@rmh-law.com		
17	FOR THE DEFENDANT:		
18	KING & SPALDING		
	1185 Avenue of the Americas		
19	34th Floor		
	New York, New York 10036		
20	BY: John Ewald, Esquire		
	Jewald@kslaw.com		
21	Jake Keester, Esquire		
	Jkeester@kslaw.com		
22	VIDEOGRAPHER: Maria Lima		
23	Lois Anne Robinson, RPR, RDR, CRR		
24	Court Reporter		
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<p>1 testified as follows: 2                   EXAMINATION 3 BY MR. EWALD: 4 Q    Good morning, Dr. Longo. 5 A    Good morning. 6 Q    It's been a while. 7 A    It has been a while. 8 Q    Okay. So let's get some of the 9 logistics out of the way first. 10   Well, first question is where are you 11 today? 12 A   I am in -- I'm at the -- I'm at 13 Materials Analytical Services, LLC, and I'm 14 sitting in the second -- the small conference 15 room. 16 Q   And is there anyone in the room with 17 you? 18 A   Yes. 19 Q   Who? 20 A   Leigh O'Dell. 21 Q   Anybody else? 22 A   No. 23 Q   What -- 24   At least on the screen I see a number</p>	Page 6	<p>1 analysis of fibrous -- fibrous talc and other 2 information, William E. Longo, Ph.D., CEO, MAS, 3 LLC, September 2nd, 2022. 4    I'm fairly certain that this has 5 been -- this has been provided in the past. And 6 what we have here is, on table 2, is the RG-144 7 Calidria spiked Johnson baby powder -- Johnson 8 talcum powder samples where we did PLM analysis 9 on the RG-144 spiked starting at table 2, 10 .1 percent all the way down to .0001 percent. 11 There's a typo there. 12 Q   Sorry. So the record's clear, what's 13 the typo? 14 A   CSM, we also did a standard spike from 15 .1 percent to .0001 percent, which that should be 16 for the ISO. So this was our standardization on 17 the number of structures of the Calidria going 18 all the way down, and then we have some other 19 information there that we've also provided. 20    I have -- 21 Q   Sorry, Doctor. Before we leave that 22 one, I just want to make sure I understand the 23 typo that you referred to on table 2, page 4, of 24 this report. There's an extra zero on M65947?</p>
<p>1 of different stacks of paper. Can you generally 2 describe for me what you have in front of you so 3 I know what you have? 4 A   Well, I have the supplement expert 5 report, MDL Johnson's Baby Powder, et cetera, 6 et cetera, May 2nd, 2024, which just, on page -- 7 page -- on page 5, an overview, this supplement 8 report was done to correct typographical errors 9 involving the container calculations. And then I 10 point out where those corrections were made and 11 what was made. They're very minor, but there 12 were some typos there on the number of 13 containers. And that's the only thing I changed. 14 Q   Okay. 15 MS. O'DELL: 16   And, John, I will put that in the chat 17 so you'll have it. 18 MR. EWALD: 19   Yeah. That'll be -- I was worried I 20 was missing it. So, yes, that would be great to 21 put it in the chat. Thank you. 22 A   I also have a report, PLM analysis, 23 chrysotile RIs and structure size for MAS's 24 RG-144 and SG-210 chrysotile standard in the</p>	Page 7	<p>1 A   It should be 0.001 percent, like the 2 exact same number down there for the CSM. 3 Q   Okay. 4 A   That's one too many zeros there. 5 Q   Right. 6 A   And it's interesting. I always find 7 that in the deposition when I'm explaining what 8 we have. 9    This was a -- we sent these in. I was 10 just able to locate them, the request in the -- 11 it's the photographs for the lizard- -- 12 lizardite, which -- in 1.550, and the antigorite 13 in 1.550 showing the difference that you get for 14 chrysotile for that. That's a response to the... 15    I also, starting over here, I have 16 volume 69, second quarter, 2022, the published -- 17 the published paper for Dr. Shu-Chun Su in the 18 journal called The Microscope, volume 69, 19 hyphen -- I mean 69-2, pages 51 through 69, 2022, 20 entitled "The Dispersion Staining Technique and 21 Its Application to Measuring Refractive Indices 22 of Non-opaque Materials, with Emphasis -- 23 Emphasis on Asbestos Analysis." 24    And he gave a -- he had some</p>

<p>Page 178</p> <p>1 They look at reports that you've generated where 2 you've either not found something or found 3 something. They want to look at the process 4 blanks that we say that we do on every batch of 5 TEM samples. They want to see, you know, how 6 we're determining and not contaminating samples. 7 You know, every quarter we do air samples in all 8 the areas where we handle asbestos; whether it's 9 working properly, whether they have the 10 appropriate airflow into them. You know, it's 11 just whatever -- 12 It's really not a set schedule of what 13 they're looking at. Do we calibrate the 14 balances? Did we do this? Did we do that? 15 Fortunately, I don't have to deal with them too 16 much. 17 Q So you said they look at reports. That 18 includes litigation reports? 19 A Excuse me? 20 Q So they look at reports. Does that 21 include litigation reports? 22 A Um, well, we show them the analysis of 23 a litigation report, not the -- they don't read 24 the reports. I would never do that. But we've</p>	<p>Page 180</p> <p>1 Object to the form. 2 A I'm preventing you or your client to 3 get double the confidential business records that 4 people would love to have because it would save 5 them a lot of time and effort to get these 6 certifications. 7 You know, it's the same thing with 8 NVLAP. I wouldn't give those up either until you 9 guys did a -- J&amp;J did a FOIA on it. And I wasn't 10 going to provide any information about our audit 11 with FDA. So, you know, I look at that as all 12 confidential business records. 13 MR. EWALD: 14 Q From -- 15 For all of the -- for all of the PLM 16 chrysotile tests that are included in the fourth 17 supplemental MDL report dated April 29th, 2024, 18 how much money has MAS been paid by plaintiffs' 19 lawyers? 20 A From when to when? 21 Q For all of the testing of the M- -- 22 Withdrawn. 23 From when to when is all of the tests 24 included in the fourth supplemental MDL report</p>
<p>Page 179</p> <p>1 got to show them examples of the analysis we're 2 doing. 3 But most everything else is not -- you 4 know, everything else besides what we're doing 5 for the Blount -- the Blount and the TEM, it's 6 nonlitigation that we have these other 7 certifications for. 8 Q Have you or anyone at MAS, to your 9 knowledge, asked A2LA about what it would take to 10 get certified for the PLM chrysotile method? 11 A No. Not that I'm aware. 12 Q In -- 13 Since MAS has obtained these A2LA 14 talc-related certifications, you have testified 15 on direct at various trials highlighting the 16 accreditations; correct? 17 A Absolutely. We're proud of it. And I 18 think we're the only ones in the country still 19 that has that certification on both plaintiff's 20 and defense side. 21 Q But yet you are preventing me and my 22 client from finding out anything that went into 23 obtaining those certifications. 24 MS. O'DELL:</p>	<p>Page 181</p> <p>1 dated April 29th, 2024, that are the PLM 2 chrysotile tests? 3 A I would consider that confidential. 4 Q On what basis? 5 A The basis is is that our -- we look at 6 it as confidential unless we can come to an 7 agreement, like the last time, that these 8 invoices were produced from both sides, you know, 9 your experts, our experts, and we can redact what 10 we did. 11 And I recall that the amount MAS 12 invoices for -- I think this is 2016, 2017, 2018 13 or so -- it's like 2.9 million, and RJ Lee was 14 like 5-point-something million, 5.6 million. 15 But, you know, I thought that was 16 pretty fair, that, okay, get the experts in. We 17 have to produce, you know, who we'd done the work 18 for, and we were able to redact. So this was, 19 you know, quid pro quo. It seems like only -- 20 So I always consider that confidential. 21 Q Unless there's a quid pro quo. 22 A No. I still think it ought to be 23 confidential. But certainly, you know, when the 24 judges get together and they come up with</p>

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1 something that they deem is fair for both sides.	1 studies that are contained in Dr. Longo's fourth
2 Q So it's, in your nonlegal opinion, it	2 supplemental MDL report dated April 29th, 2024,
3 should be confidential about the amount of money	3 and specifically outlined on tables 1, 2, 3, 4,
4 you have been paid by plaintiffs' lawyers to	4 5, 6, and 7 at the back of the report?
5 conduct the studies that you are relying on in	5 MS. O'DELL:
6 your fourth supplemental MDL report for your	6 Same objection.
7 expert opinions in this case?	7 MR. EWALD:
8 MS. O'DELL:	8 Q But you understand what I'm asking for?
9 Object to the form.	9 A I understand. And I would just be
10 A I'm not an attorney.	10 speculating. I have no idea on what the amounts
11 MS. O'DELL:	11 would be for all -- for the different plaintiffs
12 Yeah. Please don't give a legal	12 that we've done work for. I'm just -- you know,
13 opinion.	13 on the chrysotile.
14 MR. EWALD:	14 Q Okay. I'm about to start something
15 Q I was very clear. I asked not from a	15 new. We can stop ten minutes early if you want.
16 legal perspective.	16 MS. O'DELL:
17 MS. O'DELL:	17 Okay. Let's do it. Let's, you know,
18 Well --	18 let's go off the record and stop for the day, and
19 MR. EWALD:	19 then we'll pick it up.
20 Hold on. Hold on. You're the one --	20 VIDEOGRAPHER:
21 Leigh, hold on. Hold on.	21 Okay. Should we go off record?
22 MS. O'DELL:	22 MR. EWALD:
23 I'm not --	23 Yes.
24 MR. EWALD:	24 MS. O'DELL:
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1 There's not a question pending.	1 Thank you, John.
2 Leigh -- Leigh --	2 VIDEOGRAPHER:
3 MS. O'DELL:	3 Going off record. Time is 4:48.
4 You do not have a question pending.	4 (Deposition adjourned at 4:48 p.m.)
5 I'm objecting and saying he's provided that	5
6 there's been information provided about what he's	6
7 paid -- been paid in relation to his MDL work. I	7
8 just want to make that clear. And we provided	8
9 those invoices, and he testified to it earlier.	9
10 So to the degree you're asking	10
11 something else, you need to make it clear. And I	11
12 just want to make sure the record is -- is clear	12
13 as well that we've provided what we feel is	13
14 appropriate under the MDL order.	14
15 MR. EWALD:	15
16 And I'm happy -- I don't always ask the	16
17 best questions, but I feel like my question was	17
18 pretty clear, which is how much money has Dr. --	18
19 Sorry. Withdrawn.	19
20 How much money has AMA --	20
21 See, now you've got me all flustered,	21
22 Leigh.	22
23 How much money has MAS been paid by	23
24 plaintiffs' lawyers for the PLM chrysotile	24